

Godsey, Cindi

From: Brown, Gerry R (DEC) <gerry.brown@alaska.gov>
Sent: Thursday, February 07, 2013 1:55 PM
To: Godsey, Cindi
Subject: RE: Authorization letters

Cindi,

I think these authorizations are per the permit albeit ambiguous and possibly difficult to defend.

Section I(D)(4) 2007 Permit:

Applicants will be authorized to discharge as of the date of written notification by EPA that the discharge is authorized and a permit number under this general permit has been assigned. Applicants who have requested a sanitary wastewater discharge mixing zone will be authorized to discharge only after receiving a mixing zone authorization from ADEC, which would include the State's mixing zone determination and public notice by ADEC (18 AAC 70.240). For existing dischargers who have previously applied for coverage under this reissued permit, discharge will be authorized beginning on the effective date of this permit. This permit only authorizes the discharge of pollutants from waste streams that have been clearly identified in the NOI.

I think I read somewhere that authorizations have to be succinct with respect to discharges. Can't remember where.

From: Godsey.Cindi@epamail.epa.gov [mailto:Godsey.Cindi@epamail.epa.gov]
Sent: Thursday, February 07, 2013 11:25 AM
To: Brown, Gerry R (DEC)
Subject: Authorization letters

(See attached file: EPA_COOK_INKPR_025866.PDF)(See attached file: EPA_COOK_INKPR_025868.PDF)(See attached file: EPA_COOK_INKPR_025869.PDF)